

UNITED STATES DISTRICT COURT
DISTRICT COURT OF MASSACHUSETTS
CIVIL ACTION NO: 0411822RGS

FILED
IN CLERKS OFFICE
2004 OCT -4 P 3:13

Gail F. Thomas
Plaintiff

U.S. DISTRICT COURT
DISTRICT OF MASS.

v.

DANIELS LAW OFFICES, P.C.
Defendant

DEFENDANT'S ANSWER

1. No response required.
2. No response required.
3. Defendant lacks sufficient information to admit or deny.
4. Admitted.
5. Admitted.
6. As the note is not appended to the complaint, defendant lacks sufficient information to admit or deny.
7. Defendant lacks sufficient information to admit or deny.
8. Defendant lacks sufficient information to admit or deny.
9. Defendant lacks sufficient information to admit or deny. Defendant lacks sufficient information to admit or deny.

10. Defendant lacks sufficient information to admit or deny.
11. Defendant lacks sufficient information to admit or deny.
12. Defendant lacks sufficient information to admit or deny.
13. Defendant lacks sufficient information to admit or deny.
14. Defendant lacks sufficient information to admit or deny.
15. Defendant lacks sufficient information to admit or deny.
16. Defendant lacks sufficient information to admit or deny.
17. Defendant lacks sufficient information to admit or deny.
18. Defendant lacks sufficient information to admit or deny.
19. Defendant lacks sufficient information to admit or deny.
20. Defendant lacks sufficient information to admit or deny.
21. Defendant lacks sufficient information to admit or deny.

22. Admitted that the plaintiff contacted DLO,
otherwise, denied.

23. Defendant lacks sufficient information to admit
or deny.

24. Admitted that the letter was sent. Otherwise
denied.

25. Admitted that the letter was sent, otherwise,
denied.

26. Admitted that the letter was sent, otherwise,
denied.

27. Admitted that the letter was received, otherwise
denied.

28. Admitted that the letter was received, otherwise,
denied.

29. Admitted.

30. Admitted that the letter was sent, otherwise
denied.

31. Admitted that the letter was received, otherwise
denied.

32. Admitted that the letter was sent, otherwise
denied.

33. Admitted that the letter was received, otherwise
denied.

34. Admitted that plaintiff was served. Otherwise denied.

35. Admitted that Daniels has received regular monthly payments. Defendant lacks information regarding the plaintiff's future intentions and cannot admit the remainder of the statement.

36. Admitted that the letter was sent, otherwise denied.

37. Defendant lacks sufficient information to admit or deny.

38. Denied.

CLAIM FOR RELIEF

39. No response required.

40. Denied.

a. Denied.

b. Denied.

c. Denied.

d. Denied.

e. Denied.

f. Denied.

g. Denied.

h. Denied.

i. Denied.

j. Denied.

k. Denied.

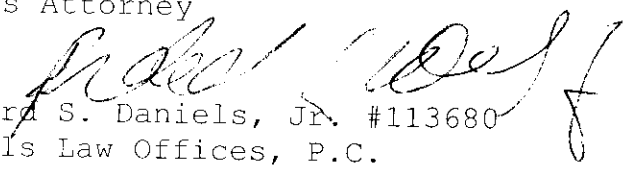
l. Defendant lacks information sufficient to admit
or deny.

41. Denied.

AFFIRMATIVE DEFENSES

1. Defendant claims that any error was caused as a result of bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error.
2. The plaintiff fails to provide the requisite statements of damages.
3. The complaint is barred from recovery because she failed to take reasonable steps to mitigate her damages.
4. The defendant acted in good faith and did not intentionally engage in the acts alleged in the complaint.
5. Some or all of the plaintiff's claims are barred by the applicable statute of limitations.

Respectfully submitted
Daniels Law Offices,
By its Attorney


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